



Illinois Environmental Protection Agency • P. O. Box 19276, Springfield, IL 62794-9276

217/782-6761

Refer to: 1631210010 -- St. Clair County
American Bottoms Regional WTP
ILD000672337
Compliance File

COMPLIANCE INQUIRY LETTER

Certified # *P115 235 898*

November 29, 1989

American Bottoms Regional WTP
ATTN: George R. Schillinger, General Manager
#1 American Bottoms Road
Sauget, Illinois 62201

Dear Mr. Schillinger:

The purpose of this letter is to address the status of the above-referenced facility in relation to the requirements of 35 Ill. Adm. Code Part 722 and to inquire as to your position with respect to the apparent violations identified in Attachment A and your plans to correct these apparent violations.

The Agency's findings of apparent non-compliance in Attachment A are based on an inspection completed on November 3, 1989. For your convenience a copy of the inspection report is enclosed with this letter.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the identified violations, a description of the steps which have been taken to correct the violations and a schedule, including dates, by which each violation will be resolved. The written response, and two copies of all documents submitted in reply to this letter, should be sent to the following:

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
Post Office Box 19276
Springfield, Illinois 62794-9276

Further, take notice that non-compliance with the requirements of the Illinois Environmental Protection Act and rules and regulations adopted thereunder may be the subject of enforcement action pursuant to either the Illinois Environmental Protection Act, Ill. Rev. Stat., Ch. 111 1/2, Sec. 1001 et seq. or the federal Resource Conservation and Recovery Act (RCRA), 42 U.S.C. Sec. 6901 et seq.

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St. Clair County
American Bottoms Regional WWTP
ILD000672337

ATTACHMENT A

- i. Pursuant to 35 Ill. Adm. Code 722.111, a person who generates a solid waste as defined in Section 721.102, must determine if that waste is a hazardous waste using the following method:

- a. He should first determine if the waste is excluded from regulation under Section 721.104.
- b. He must then determine if the waste is listed as a hazardous waste in Subpart D of Part 721.

Note: Even if a waste is listed, the generator still has an opportunity under Section 720.122 and 40 CFR Section 260.22 to demonstrate that the waste from his particular facility or operation is not a hazardous waste.

- c. If the waste is not listed as a hazardous waste in Subpart D of Part 721, he must determine whether the waste is identified in Subpart C of Part 721 by either:
 1. Testing the waste according to the methods set forth in Subpart C of Part 721, or according to an equivalent method approved by the Board under Section 720.120; or
 2. Applying knowledge of the hazard characteristic of the waste in light of the materials or the processes used.

You are in apparent violation of Section 722.111 for the following reason:
The above determination has not been made for the waste oil generated by the facility.

MDG:cas/0433L

006877

RESPONSE TO 11/29/89 CIL.

CLN

AMERICAN BOTTOMS 1631210010 -- St. Clair County
REGIONAL WASTEWATER TREATMENT FACILITY Compliance File

1 AMERICAN BOTTOMS ROAD

SAUGET, ILLINOIS 62201

(618) 337-1710

FAX (618) 337-8919

December 15, 1989

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Illinois Environmental Protection Agency
Division of Land Pollution Control
2200 Churchill Road
P. O. Box 19276
Springfield, Illinois 62794-9276

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
P 117 029 279

Dear Ms. Tin,

On November 3, 1989, an inspection of our facility was done by Mike Grant of Illinois Environmental Protection Agency, Division of Land Pollution Control. During the inspection, Mr. Grant requested that we analyze the waste oil we generate from our maintenance program. In particular, Mr. Grant requested that we test a sample for a number of parameters for E. P. toxicity characteristics. Those parameters included Arsenic, Barium, Cadmium, Chromium, Lead, Mercury, Selenium and Silver. In addition, the sample was tested for ignitability and corrosiveness.

Pursuant to his request, and your letter dated November 29, 1989, our analysis was performed on that oil. A copy of the results are attached.

The results of the tests requested define a non-hazardous waste. In the future we will establish a suitable testing program to analyze the hazardous characteristics of our waste oil.

If you have any comments, or questions, please advise.

Sincerely,

Robert D. Roddy

Robert D. Roddy, P. E.
Plant Manager

RDR:sct

Enclosures

c: George R. Schillinger
Susan M. Franzetti

RECEIVED
DEC 18 1989
IEPA-DLPC

**AMERICAN BOTTOMS
REGIONAL WASTEWATER TREATMENT FACILITY**

LABORATORY REPORT

EP TOXICITY

SW - 846 Method No. 1310

SAMPLE DATE: November 14, 1989

SAMPLE LOCATION: American Bottoms Maintenance Department - Waste Oil

INORGANIC

<u>PARAMETER</u>	<u>RESULTS</u>	<u>MAXIMUM ALLOWABLE</u>
Arsenic	0 mg/L	5.0 mg/L
Barium	0.31 mg/L	100.0 mg/L
Cadmium	0.01 mg/L	1.0 mg/L
Chromium	0.09 mg/L	5.0 mg/L
Lead	0.51 mg/L	5.0 mg/L
Mercury	0.0001 mg/L	0.2 mg/L
Selenium	0 mg/L	1.0 mg/L
Silver	0 mg/L	5.0 mg/L

IGNITABILITY & CORROSIVENESS

Ignitable Waste	> 200° F	140° F
Corrosive Waste	6.5 pH	≥ 2 pH ≤ 12 pH

Verified by: Tom G. Makara

000379

To: Reviewer Name Mike Grant Region Collinsville
 Re: Site Name American Bottoms Region WWTP Date of Response 12-13-89
 Site No. 1631210010 -- St. Clair County Date Received 12-18-89
 CIL Date 12-29-89

STATUS OF VIOLATIONS

[illegible]

Information packet for PECL must include all unresolved violations.

Reviewer Signature

Return to: HWRC Chris Niboy
Facilities Compliance Unit
Land Pollution Control #24

RECEIVED
IEPA

DEC 26 1989

COLLINSVILLE



Illinois Environmental Protection Agency

P. O. Box 19276, Springfield, IL 62794-9276

217/782-6751

Refer to: 1631210010 -- St. Clair County
American Bottoms Regional WWT
ILD000672337
Compliance File

January 2, 1990

American Bottoms Regional WWT
Attn: George R. Schillinger, General Manager
#1 American Bottoms Road
Sauget, Illinois 62201

Dear Mr. Schillinger:

The Agency is in receipt of your December 15, 1989 response(s) to our November 29, 1989 Compliance Inquiry Letter. Your response(s) has been reviewed and the apparent violation(s) of Section(s) 722.111 is now considered resolved.

If you have any questions, please contact Mike Grant at 618/346-5120.

Sincerely,

Angela Aye Tin

Angela Aye Tin, Manager
Technical Compliance Unit
Compliance Section
Division of Land Pollution Control

AAT:MG:CLN:bjh/0008n/8

cc: Division File
Collinsville Region
Chris Nifong
Bruce Carlson

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